



# INSTRUCTION

## RCRA & TSCA UNITS PRE-SHIPMENT VERIFICATIONS

RMRS/OPS-INSTR.038

Revision 0

Effective Date: 5/27/99

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Approved: \_\_\_\_\_

Date: \_\_\_\_\_

3/23/99

Responsible Manager

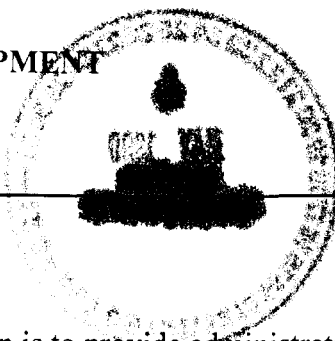
### USE CATEGORY 3

This procedure is performed as written and need **not** be in hand for the performance of the described tasks.

**This procedure is available at a known location for reference.**

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ADMIN RECCRD



1. **PURPOSE**

The purpose of this instruction is to provide administrative operational controls addressing inventory constraints for hazardous materials within Resource Conservation Recovery Act, Toxic Substance Control Act (RCRA, TSCA) and 90 Day storage areas identified in this instruction.

2. **SCOPE**

- This administrative instruction is limited to the following RCRA Units: 1, 10, 13, 15A, 24, 18.03, 18.04, 90-Day Accumulation Areas and TSCA Unit 5002 (Building 666 and Building 666 cargo's)
- The controls in this instruction appear as independent appendices that are derived from the RCRA Permit and 40 CFR 761 and are presented on a unit by unit basis.
- A separate appendix is provided for 90-Day area receipts.

**NOTE:** A "group" is an array of waste crates that does not exceed a total of 8.4 grams Pu. Nominally, thirteen crates if assay values unknown.

3. **LIMITATIONS**

- Groups of radioactive wooden waste crates in outside storage in a RCRA/TSCA unit **SHALL** be at least 30 feet from other groups of crates or materials in the unit.
- The facility inventory of each RCRA and/or TSCA Unit **SHALL** not exceed the amount and type allowed by the permit for that unit.
- RCRA and TSCA Units within the scope of this instruction **SHALL** not accept TRU/TRM wastes.
- 90-Day Accumulation Areas **SHALL** be established per 1-D65-HWRM-09, Management of 90-Day Accumulation Areas.

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4. INSTRUCTIONS/RESPONSIBILITIES

4.1 Shipper

- **SHALL** complete and submit a Verification Worksheet to the associated RCRA/TSCA Custodian for the specific unit to which waste is to be shipped.
- Shipper **SHALL** provide complete and accurate information appropriate to each waste package to be shipped prior to shipment.
- Shipper **SHALL** legibly print their name, sign and legibly enter their employee (man) number on Verification Worksheets prior to sending the worksheets to the receiving Unit Custodians.
- Verification Worksheets **SHALL** be provided to Unit Custodians no less than 24 hours prior to a shipment.
- Prior to shipment ensure RMRS Customer Service has approved acceptance of each waste package, if applicable.
- Prior to shipment, verify that no unacceptable containers (as reported back by the Unit Custodians) are scheduled for transfer to a RCRA/TSCA Unit.
- Attach a WEMS accuracy report for each container in a shipment.
- Provide shipping paperwork for each container.
- TSCA PCB containing waste packages **SHALL** have an out of service date written on the waste package.

4.2 Unit Coordinator:

- **SHALL** verify shippers data on Verification Worksheets agrees with WEMS accuracy report prior to approval of each shipment.
- **SHALL** circle YES or NO in the last column of the Verification Worksheet to accept or deny approval to ship each container.
- **SHALL** verify that the contents of each shipment do not cause an excess total capacity or liquid capacity and are of allowed waste types as specified in each Unit specific RCRA/TSCA Permit.
- **SHALL** verify that receiving the contents of any shipment into a unit do not cause a non-compliant condition to occur, such as storage of non-compatible waste.

- Although the RCRA Permit identifies Transuranic Mixed Waste (TRM) as an acceptable waste form, the Unit Coordinator will verify that no TRM is accepted into the RCRA/TSCA Units as listed in this instruction.
- **SHALL** manage all waste packages listed with an L or B in Column 6 as a liquid.
- **SHALL** use the Verification Worksheets to determine the storage location within a RCRA/TSCA Unit of accepted waste.
- Contact the Shipper to inform them of any non-compliant or unacceptable package.

## 5. RECORDS

Record Type	Record Type Determination	Protection/Storage Method	Processing Instructions
Verification Worksheets	In process record.	Protect from loss while in use.	Shipper completes all sections, then forwards to Unit Custodian.
Verification Worksheets	In process record.	Protect from loss during review.	Unit Custodian reviews information and accepts or declines containers.
Verification Worksheets	RCRA Operating Record	Maintain in a reasonably secure location such as a file cabinet.	File in the Operating Record for the associated RCRA/TSCA Unit. Process according to RM-06.02, Record Identification, Generation and Transmittal.
Unit 5002 Inventory Control Worksheet	TSCA Operating Record	Maintain in a reasonably secure location such as a file cabinet.	File in the Operating Record for the associated RCRA/TSCA Unit. Process according to RM-06.02, Record Identification, Generation and Transmittal

## 6. REFERENCES

- 1-D65-HWRM-09, Management of 90-Day Accumulation Areas
- 1-T93-Traffic-110, Onsite Transportation of Hazards and Radioactive Materials Manual
- 40 CFR 761, Code of Federal Regulations
- RCRA Permit and Compliance Documents

Appendix 1

RCRA Unit Verification Worksheet Instructions

**Note 1:** *Shipper completes all white sections, Unit Custodian completes all shaded sections of Verification Worksheets.*

**Note 2:** *Abbreviations are acceptable, such as Y for yes and N for no.*

Column 1 Enter the six-digit container number.

Column 2 Enter "yes" if the container has passed RTR, "no" if it has failed RTR inspection. If the waste package has failed RTR provide a copy of RF47001, RTR Waste Package Report

Column 3 Enter the EPA Code(s) of the container number entered into Column 1.

**IF** the container has several EPA Codes,  
**THEN** enter as shown in Appendix 2 (Example.)

Column 4 Enter YES, if gram value of the container number entered into column 1 is less or equal to 15 grams of U235 or depleted uranium.  
Enter NO, if gram value of the container number entered into column 1 is greater than 15 grams of U235. Waste packages containing greater than 15 grams of U235 cannot be received unless it is U235 associated with depleted uranium.

Column 5 Enter the Capacity in gallons of the Waste package to be shipped. (Full crates = 830 gallons, half crates = 415 gallons.)

Column 6 Enter S if the material to be shipped is a solid, L if a liquid, B if both. "B" is entered when the waste is packaged as a solid, however, due to a known presence of free liquid or a potential for free liquid to accumulate and leach from the waste matrix secondary containment is required during storage. When a B is entered, write the gallons of liquid within the container such as B 5.

Column 7 Enter the following abbreviations for the waste type (including asbestos or PCB containing waste) being shipped. Enter: P/RE number if Hazardous, LLW if Low Level Waste, LLM if Low Level Mixed Waste, LLT if Low Level TSCA, TSC if Toxic Substance Control Act materials. IF the waste also contains asbestos enter ASB for asbestos and/or PCB for polychlorinated biphenyl's. (There may be more than one waste type per waste package.)

Column 8 Enter the Compatibility Code. (There may be more than one CC per waste package.)

Column 9 Enter P if contents are Peroxide Forming Materials and/or R if contents are Reactive Materials or NA if Not Applicable.

Column 10 Enter Yes if the waste package has been backlog reassessed, No if not or WGI if packaged per a Waste Generation Instruction **OR** if Customer Service accepted the package.

Column 11 If the waste package meets On Site or DOT Shipping Requirements enter Yes, if not enter No. Customer Service acceptance of a waste package can be credited as meeting DOT Requirements. For any legacy waste compliance is established through notification that requirements in 1-T93-Traffic-110, Onsite Transportation of Hazards and Radioactive Materials Manual are satisfied for the given waste.

- If waste package is a Waste Chemical, provide a Waste Chemical Traveler Addendum with the Verification Sheet(s). Shipper completes the Liquid Volume to be shipped. (add up volume of liquid from Column 5)
- Shipper completes the total volume to be shipped. (sum of Column 5.)
- Shipper prints name, provides signature and employee number in appropriate locations.
- Shipper provides the completed Verification Worksheet to the Unit Custodian at least 24 hours prior to shipment.
- Shipper provides additional information or comments as needed on a separate sheet.

Column 12 RCRA/TSCA Unit coordinator circles acceptance or rejection of package.

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## APPENDIX 2

### Verification Worksheet (EXAMPLE)

All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.

**Acceptable EPA Waste Codes: D001-D012, D015-D030, D033, D035-D043, F001-F003, F005-F009, F027, "P" Series and "U" Series.**

[illegible]

This shipment will contribute 117 Gallons to the Unit Liquid Capacity  
This shipment will contribute 125 Gallons to the Unit Maximum Capacity

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit?	YES	NO	Initial

SHIPPER

RECEIVED

Submitted by (print)

**Verified by (print)**

Signature \_\_\_\_\_

**Signature**

Employee (man) #: PH/Pager/Fax

Employee (man) number

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All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.

# Verification Worksheet

## Unit 1

[illegible]

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit?	YES	NO	Initial

RECEIVER

**Verified by (print)**

**Signature**

Employee (man) number

Employee (man) number

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## APPENDIX 5

### Verification Worksheet

**All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.**

**Acceptable EPA Waste Codes: D001, D002, D004-D009, D011, D019, D022, D027-D029, D035, D039, D040, D043, F001, F002, F005-F007, F009, F039**

This shipment will contribute _____ Gallons to the Unit Liquid Capacity This shipment will contribute _____ Gallons to the Unit Maximum Capacity	Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit? YES _____ NO _____ Initial _____
---	---

RECEIVED

**Verified by (print)**

Signature \_\_\_\_\_

Employee (man) number

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### From Building (location)

# Unit 13

All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.

[illegible]

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit? YES NO Initial

RECEIVED

Employee (man) number

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**APPENDIX 7**  
**Verification Worksheet**

**Unit 24**

**All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.**

[illegible]

<p><i>This shipment will contribute _____ Gallons to the Unit Liquid Capacity</i></p> <p><i>This shipment will contribute _____ Gallons to the Unit Maximum Capacity</i></p>	<p>Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit? YES NO Initial</p>
--	--

SHIPPER

RECEIVED

Submitted by (print)

**Verified by (print)**

**Signature**

**Signature**

Employee (man) #: PH/Pager/Fax

Employee (man) number

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**APPENDIX 8**  
**Verification Worksheet**

**Unit 18.04**

All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.

**Acceptable EPA Waste Codes: D004-D009, D011, D022, D027-D029, D035, D039, D040, D043, F001-F003, F005-F007, F009, F039**

[illegible]

This shipment will contribute \_\_\_\_\_ Gallons to the Unit Liquid Capacity  
This shipment will contribute \_\_\_\_\_ Gallons to the Unit Maximum Capacity

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit?	YES	NO	Initial

SHIPPER

RECEIVED

Submitted by (print)

**Verified by (print)**

Signature \_\_\_\_\_

Signature \_\_\_\_\_

Employee (man) #: PH/Pager/Fax

Employee (man) number

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**APPENDIX 9**  
**Verification Worksheet**  
**Unit 15A.**

**All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.**

[illegible]

This shipment will contribute _____ Gallons to the Unit Liquid Capacity This shipment will contribute _____ Gallons to the Unit Maximum Capacity	Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit? YES _____ NO _____ Initial _____
---	---

SHIPPER		RECEIVER
Submitted by (print) _____	Verified by (print) _____	
Signature _____	Signature _____	
Employee (man) #: _____	Employee (man) number _____	
PH/Pager/Fax _____		

Appendix 10

90 Day Area Verification Worksheet Instructions

- Note 1:** *Shipper completes all white sections, Unit Custodian completes all shaded sections of Verification Worksheets.*
- Note 2:** *Abbreviations are acceptable, such as Y for yes and N for no.*
- Note 3:** *Any column information that is not yet known enter TBD.*
- Column 1 Enter the six-digit container number.
- Column 2 Enter the Accumulation Start Date (ASD), (example 3/21/99).
- Column 3 Enter the EPA Code(s) of the container number entered into Column 1.  
**IF** the container has several EPA Codes,  
**THEN** enter as shown in Appendix 2 Example.
- Column 4 Enter YES, if gram value of the container number entered into column 1 is less or equal to 15 grams of U235 or depleted uranium.  
Enter NO, if gram value of the container number entered into column 1 is greater than 15 grams of U235. Waste packages containing greater than 15 grams of U235 cannot be received unless it is U235 associated with depleted uranium..
- Column 5 Enter the Capacity in gallons of the Waste package to be shipped. (Full crates = 830 gallons, half crates = 415 gallons)
- Column 6 Enter S if the material to be shipped is a solid, L if a liquid, B if both. "B" is entered when the waste is packaged as a solid, however, due to a known presence of free liquid or a potential for free liquid to accumulate and leach from the waste matrix secondary containment is required during storage. When a B is entered, write the gallons of liquid within the container such as B 5..
- Column 7 Enter the following abbreviations for the waste type (including asbestos or PCB containing waste) being shipped. Enter Non, if Non-Hazardous, Haz if Hazardous, LLW if Low Level Waste, LLM if Low Level Mixed Waste, LLT if Low Level TSCA, TSC if Toxic Substance Control Act materials. IF the waste also contains asbestos enter ASB for asbestos. There may be more than one per waste package.
- Column 8 Enter the Compatibility Code. There may be more than one per waste package.
- Column 9 Enter type of container waste is packaged in, i.e. box, bag, drum, crate.
- Shipper completes the Liquid Volume to be shipped. (use data from Column 5)
  - Shipper completes the total volume to be shipped. (use data from Column 5.)
  - Shipper prints name, provides signature and employee number in appropriate locations.
  - Shipper provides the completed Verification Worksheet to the Unit Custodian at least 24 hours prior to shipment.
- Column 10 If the waste package meets On Site or DOT Shipping Requirements enter Yes, if not enter No.
- Column 11 RCRA/TSCA Unit coordinator circles acceptance or rejection of package.

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## APPENDIX 11

### Verification Worksheet

#### 90 Day Accumulation Area

**All boxes must have an entry. Receiver completes shaded section. Shipper completes all others. If package is a waste chemical, attach Waste Chemical Program Traveler Addendum.**

Acceptable EPA Waste Codes: D001-D012, D015-D019, D021, D022, D024-D029, D033, D035-D043, F001-F003, F005-F009, F027, F039 & all P and U listed EPA Waste Codes.

[illegible]

This shipment will contribute \_\_\_\_\_ Gallons to Unit Liquid Capacity  
This shipment will contribute \_\_\_\_\_ Gallons to Unit Maximum Capacity

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit?	YES	NO	Initial

SHIPPER

RECEIVED

Submitted by (print)

**Verified by (print)**

**Signature**

**Signature**

Employee (man) #: PH/Pager/Fax

Employee (man) number

Appendix 12

TSCA Unit 5002 Verification Worksheet Instructions

**Note 1:** *Shipper completes all white sections, Unit Custodian completes all shaded sections of Verification Worksheets.*

**Note 2:** *Abbreviations are acceptable, such as Y for yes and N for no.*

Column 1 Enter the six-digit container number.

Column 2 Enter YES if the container has been through RTR, NO if it has not been through RTR.

Column 3 Enter YES if gram value of the container number entered into column 1 is less than 15 grams of U235.

Enter NO if gram value of the container number entered into column 1 is greater than 15 grams of U235.

Column 4

Column 4 Enter the Capacity in gallons of the Container to be shipped.

Column 5 Enter S if the material to be shipped is a solid, L if a liquid, B if both.

Column 6 Enter the following abbreviations for the waste type (including asbestos or PCB containing waste) being shipped. Enter Non, if Non-Hazardous, Haz if Hazardous, LLW if Low Level Waste, LLM if Low Level Mixed Waste, TSC if Toxic Substance Control Act materials. IF the waste **also** contains asbestos enter ASBF for friable asbestos, ASBN for Non-friable asbestos and/or PCB for polychlorinated biphenyl's. (There may be more than one abbreviation per waste package.)

Column 7 Enter the Compatibility Code. (There may be more than one per waste package.)

Column 8 Enter the out of service date, month/day/year. (example; 3/21/98)

Column 9 If the waste package meets On Site **or** DOT Shipping Requirements enter Yes, if not enter No.

Column 10 TSCA Unit 5002 Coordinator circles acceptance or rejection of package and provides acceptance or rejections information to the shipper.

- If waste package is a Waste Chemical, provide a Waste Chemical Traveler Addendum with the Verification Sheet(s).
- Shipper prints name, provides signature and employee phone and fax numbers in appropriate locations.
- Shipper provides the completed Verification Worksheet to the Unit Custodian at least 24 hours prior to shipment.
- Receiver completes shaded section with name, signature and employee number.

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**APPENDIX 13**  
**Verification Worksheet**

**TSCA UNIT 5002**

**All boxes must have an entry. Receiver completes shaded section. Shipper completes all others.**

Will acceptance of this shipment exceed permitted capacity or cause a non-compliant condition for this unit? YES ☐ NO ☐ Initial

SHIPPER		RECEIVER	
Submitted by (print) _____		Verified by (print) _____	
Signature _____		Signature _____	
Employee (man) #: _____		Employee (man) number _____	
PH/Pager/Fax _____			

Appendix 14

Unit 5002 Inventory & Capacity Controls Worksheet Instructions

- NOTE 1:** *Steps 1-4 are initial inventory steps to provide a starting point for the inventory control program for Unit 5002. Steps 5-8 are performed for each segment whenever inventory changes.*
- NOTE 2.:** *This activity may take place on an Excel Spreadsheet or on a paper copy of the following appendix.*

For each segment:

1. Enter the number of 55 gallon drums under the column "Inventory of 55 Gallon Drums". (this number should not be greater than the number allowed per segment as identified in the FSA.)
2. Enter the number of 5 gallon drums under the column "Inventory of 5 Gallon Drums". (this number should not be greater than the number allowed per segment as identified in the FSA.)
3. Enter the number of 10 gallon drums under the column "Inventory of 10 Gallon Drums". (this number should not be greater than the number allowed per segment as identified in the FSA.)
4. Enter the number of Crates under the column "Inventory of Crates". (this number should not be greater than the number allowed per segment as identified in the FSA.)

When inventory changes perform the following steps for each segment that has a change.

5. Increase or decrease the number of drums or crates to the appropriate waste package inventory column.
6. Multiply the number of drums or crates times the capacity of the waste container.
7. This number is added to the Total Unit Inventory (gal) column.
8. By subtracting the Total Inventory from the Maximum capacity the Available Capacity will result.
9. Enter the result of step 8 to the column Available Capacity.

Appendix 15  
Unit 5002 Inventory & Capacity Controls Worksheet

All units are in gallons.

Segment Number	Max Capacity (gal.)	Total Unit Inventory (gal.)	Inventory of 55 Gal Drums	Inventory of 5 Gal Drums	Inventory of 10 Gal Drums	Crates	Available Capacity (gal.)
1	2210	1835	33	0	2		375
2	6160	5060	92		0		1100
3	1950	1650	30	0	0		300
4	6640	5810				7	830
5	1660	0				0	1660
6 (cargo 6)	2210	910	16	0	3		1297
7 (cargo 5)	2210	1715	31	0	1		494
8 (cargo 4)	2210	1685	29	0	9		516
9 (cargo 3)	2210	1880	34	0	1		329
10	2210	10	0	0	1		2199
11 (cargo 1)	2210	910	16	0	3		1297
<b>TOTAL</b>	<b>31880</b>	<b>21465</b>			<b>Total Available Gallons</b>		<b>10397</b>

**Activity:** Shipped one 55 and one 10 gal drum out of Segment 1. Received one Crate into Segment 5.

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